

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Big Lots, Inc., *et al.*

Debtor(s).

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

Hrg. Date: 9/11/25 at 1:00 p.m.

Obj. Deadline: 9/4/25

**NOTICE OF MOTION FOR RELIEF FROM STAY**

PLEASE TAKE NOTICE that Creditor, Adam Herrera (hereinafter “Creditor”), by and through undersigned counsel, hereby submits this motion (the “Motion”) for entry of an Order modifying the automatic stay and/or any plan injunction, pursuant to 11 U.S.C. §§ 105(a), 362 and 524. More specifically, Creditor seeks authority to proceed with legal action against the Debtor, Big Lots, Inc, et al, (the “Debtors”), as nominal parties only, and to proceed to collect any judgment or settlement obtained solely against available insurance proceeds.

PLEASE TAKE FURTHER NOTICE that objections, if any, to relief requested in the Motion shall be filed on or before 9/4/25 (the “Objection Deadline”); PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) on the Motion will be held on 9/11/25 at 1:00 p.m. (Eastern Standard Time) before the Honorable J. Kate Stickles at the United States Bankruptcy Court for the District of Delaware, 824 Market Street, 5th Floor, Courtroom #6, Wilmington, Delaware 19801. The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court. The attorneys for the parties shall confer with respect to the issues raised by the Motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN  
ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF  
REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Respectfully Submitted,

COLLINS PRICE WARNER & WOLOSHIN

/s/ Raeann Warner

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*Attorney for Creditor/Movant*